

Robert P. Spretnak, Esq. (Bar No. 5135)
Bob@spetnak.com
LAW OFFICES OF ROBERT P. SPETNAK
8275 S. Eastern Avenue, Suite 200
Las Vegas, Nevada
Telephone: (702) 454-4900
Facsimile: (702) 938-1055

Anthony J. Perez, Esq.
PRO HAC VICE
ajperez@lawgmp.com; bvirues@lawgmp.com
ANTHONY J. PEREZ LAW GROUP, PLLC
7950 W. Flagler Street, Suite 104
Miami, Florida 33144
Telephone: (786) 361-9909
Facsimile: (786) 687-0445

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN MEGGS,

Plaintiff,

vs.

CIRCA HOSPITALITY GROUP II LLC,
D/B/A THE D LAS VEGAS

Defendant

Case No.: 2:23-cv-01117-RFB-MDC

PARTIES' JOINT STIPULATION TO
EXTEND TIME TO FILE STIPULATION OF
DISMISSAL (First Request)

Plaintiff, JOHN MEGGS (hereinafter "Plaintiff"), by and through his counsel of record, ROBERT P. SPRETNAK, ESQ. of the LAW OFFICES OF ROBERT P. SPRETNAK, and ANTHONY J. PEREZ, ESQ. of the LAW FIRM OF ANTHONY J. PEREZ LAW GROUP, PLLC, and Defendant CIRCA HOSPITALITY GROUP II LLC, D/B/A THE D LAS VEGAS by and through their counsel of record, CYNTHIA L. ALEXANDER, ESQ. and ALEXIS M. TAITEL, ESQ. of DICKINSON WRIGHT PLLC, stipulate as follows:

On July 8th, 2024, the Parties filed a Stipulation to Stay this case [D.E. 36] following a Notice of Scheduling Mediation also filed by the Parties on July, 3rd, 2024 [D.E. 35], as the Parties were confident they could resolve their dispute through mediation without the need of court intervention. The Parties mediated this case with Mediator Peggy Leen on September 10th, 2024, and were able to come to an agreement. On September 11th, 2024, the Parties filed a Notice of Settlement reflecting the resolution of the case per the Mediation that took place on September 10th, 2024 [D.E. 38]. The Parties asked the Court for seventy-five (75) days from the date of the Notice of Settlement that was filed on September 11th, 2024, in order to draft a settlement agreement with language agreeable to both Parties, coordinate payment, have both Parties sign the agreement, and file dismissal documents. The Parties are requesting an extension of thirty (30) days up to and including December 26, 2023, to file a Stipulation of Dismissal in order to finalize certain terms of the settlement agreement.

WHEREFORE, the Parties respectfully request that the Court extend the time to file a Stipulation of Dismissal by thirty (30) days, and for such other relief as is just and proper.

DATED: November 25, 2024

RESPECTFULLY SUBMITTED,

/s/ Anthony J. Perez

Anthony J. Perez, Esq.

PRO HAC VICE

ANTHONY J. PEREZ LAW GROUP, PLLC

7950 W. Flagler Street, Suite 104

Miami, Florida 33144

Telephone: (786) 361-9909

Facsimile: (786) 687-0445

Emails: ajp@ajperezlawgroup.com &

jr@ajperezlawgroup.com

Attorneys for Plaintiff John Meggs

/s/ Cynthia L. Alexander

Cynthia L. Alexander, Esq.

Nevada Bar No. 6718

DICKINSON WRIGHT PLLC

Alexis M. Taitel, Esq.

Nevada Bar No. 16012

3883 Howard Hughes Parkway, Suite 800 Las

Vegas, NV 89169

Tel: 702-550-4400

Fax: 844-670-6009

Email: CAlexander@dickinson-wright.com

*Attorneys for Defendant Circa Hospitality
Group II LLC d/b/a The D Las Vegas*

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: November 26, 2024.